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Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services Under the Patient Protection and Affordable Care Act

Comment On: EBSA-2010-0018-0002

Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services under Patient Protection and Affordable Care Act: Amendment

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Comment on FR Doc # 2011-19684

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General Comment

The religious and moral objections of the Catholic Church and others to contraception and sterilization are well known. The Interim Final Rule (IFR) acknowledges these objections and attempts to accommodate them by creating a religious employer exemption to the mandated coverage for contraceptive services. While we appreciate the recognition of the need for such an exemption, the proposed definition of religious employer is wholly inadequate to protect the

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conscience rights of Catholic hospitals and health care organizations in their role as employers. It is imperative that the definition of religious employer in the regulation be broadened to provide sufficient conscience protections to religious institutional employers.¹ The reference to —contraceptive services under such guidelines,^l from which religious employers are exempted, also needs to be clarified and aligned with the language in the HRSA Guidelines.²